

# **Special Education Program Compliance Review**

## **Final Report**

April 30, 2018

**Nasha Shkola Charter School (4208-07)**

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## Introduction and Authority

The Minnesota Department of Education (MDE), as the state educational agency, is required by federal law to monitor the education of children with disabilities pursuant to the Individuals with Disabilities Education Act (IDEA). 20 U.S.C. § 1412(a)(11); 34 C.F.R. § 300.600. Additionally, state law requires every local educational agency (LEA) to ensure all students with disabilities are provided specialized instruction and services appropriate to their needs. Minn. Stat. § 125A.08(b)(1). Each LEA within the state, including educational programs administered by any public agency, is under the general supervision of MDE. In order to evaluate special education programs, MDE staff has the authority to review all relevant information necessary to carry out the department's oversight responsibilities.

## Scope of Monitoring

Monitors from MDE's Division of Compliance and Assistance conducted a full compliance review of the special education program of Nasha Shkola Charter School (4208-07). The monitoring process included a review of:

- The district's total special education system (TSES) plan and restrictive procedures plans (RPPs), if any, and new student application form
- 1 district site where special education services are provided
- Interview responses from the special education director, general education administrators, special education teachers and paraprofessionals, related services personnel and general education teachers
- Previous monitoring and self-review reports
- Formal complaint history
- 2 Part B (students ages 3 through 21) student records

## Resulting Findings and Corrective Action

The following report identifies individual student record noncompliance, findings of systemic noncompliance and corrective action requirements. Findings of systemic noncompliance are identified based on an analysis of compliance data collected from the sources listed above. If an area is identified as a finding of systemic noncompliance, the district is required to develop and implement a corrective action plan (CAP) to address each finding within one year of the date of this report.

Individual student record noncompliance occurs when a student file is cited for violation of any state or federal special education law. Citations of individual student files must be corrected by the district by March 1, 2019. If individual student noncompliance is identified for correction, tracking is

completed through the Minnesota Continuous Improvement Process: Self Review (MNCIMP:SR) system and the district may be required to develop and implement a CAP to address findings of noncompliance.

## **District Overview**

Nasha Shkola Charter School provides education for students in kindergarten through grade 8 and is located in Brooklyn Park. According to the district website, the school addresses the needs of the local Russian-speaking community and supports bilingual children and students interested in Russian language and culture. Nasha Shkola means “our school” in Russian. Students are instructed in English for curriculum content while offering Russian language and culture classes to enrich Russian literacy acquisition. 98% of the student population speaks Russian at home or has at least one Russian speaking parent. Russian speaking staff teach Russian language, music, and math, and provide bilingual support. Students attending the district become proficient in both Russian and English.

## **Monitoring Findings by Area**

### **Area 1: Governance**

#### *Topic Area: Total Special Education System*

A total special education system (TSES) is a plan describing a district’s special education policies, procedures and programs. A plan for a single district identifies the district’s responsibilities regarding child study procedures, methods of providing the special education services for identified pupils, administration and management plans to assure effective and efficient results, operating procedures of interagency committees and any interagency agreements into which the district has entered.

After conducting a self-review, the special education director provided MDE with an assurance that the district’s TSES demonstrates 100% compliance with Minnesota Rule 3525.1100.

**Corrective Action: None**

#### *Topic Area: Charter School Application*

A review of the charter school application, as shared by the director of special education and located on the charter school’s website, determined that the district does not require applicants to disclose more information than permitted by state law and is therefore considered compliant.

**Corrective Action: None**

### *Topic Area: Restrictive Procedures Plan*

“Restrictive procedures” means the use of physical holding or seclusion of children with disabilities in an emergency. The special education director for Nasha Shkola Charter School reported the district does not use physical holding of children with disabilities in an emergency and therefore does not maintain a restrictive procedures plan (RPP) for children with disabilities.

**Corrective Action: None**

### *Topic Area: Staffing*

The district’s special education administrative staffing includes a special education director while an executive director provides district-level administrative leadership. A general education lead teacher also supports staff. The executive director is onsite two days per week with much of the day to day operations coordinated by the lead teacher. The district is staffed with special education personnel consisting of 1 special education teacher, 1 related service provider and 1 special education paraprofessional. The related service provider is a speech language pathologist contracted through an outside agency. The special education teacher also is contracted from an outside agency. The very small percentage of students receiving special education in an already small student population presents challenges in meeting hiring needs as the small caseload does not justify employing even a half time employee. The contracted special education teacher provides services for students and completes necessary paperwork. When additional minutes are needed, a district general education teacher with a licensure variance is able to provide those services. The special education director reported that the contracted special education teacher is diligent in meeting due process requirements and providing quality programming for special education students in the district.

Special education and building administration were asked to describe the delivery of special education services or support when special education teachers, related service providers, or paraprofessionals are absent. Interview responses confirmed procedures related to short- and long-term absences and the process for informing substitutes about relevant IEP information. Due to the circumstances of a small case load, students do not require daily supports. If there is a short-term absence, the special education teacher would adjust when services would be provided within the same week that minutes were missed. For long-term absences, one of the district general education teachers has a special education license and would cover the absence with another substitute hired to fill the general education position. Related service providers adjust days when services are delivered in the case of a short term absence. For an extended absence, a contracted substitute would be hired or speech teleservices would be provided. The special education director would assist in securing replacements for long-term positions. When a paraprofessional is absent, a general education paraprofessional covers the duties. If a paraprofessional was gone on extended leave, the district would contact a substitute agency or work with the special education director to obtain a long-term paraprofessional substitute. The lead teacher is tasked to provide relevant information for special education provider substitutes, while a special or general education teacher would detail information for paraprofessionals.

No concerns were reported by special education teachers, related service providers, paraprofessionals and general education teachers regarding the delivery of special education services or support when special education teachers, related service providers or paraprofessionals are absent.

**Corrective Action: None**

### *Topic Area: Training*

Special education professional development initiatives have been offered to licensed and non-licensed district personnel over the past two years. This school year, staff received training on mental health, accommodations and Crisis Prevention Interventions (CPI). The special education teacher received training on the district child find process and attended Minnesota Department of Education (MDE) compliance training. The special education director provided individualized special education training to a few general education staff.

Other than via district-led trainings, licensed and non-licensed staff is informed of special education policies and procedures or changes to special education policies and procedures through emails and conversations with the special education director. The special education director visits the district twice per month and meets with the lead teacher and building administration during those visits. The lead teacher shares pertinent information from those meetings with the rest of the staff through email correspondence or weekly staff meetings. Special education and building administration meet to identify training needs in order to provide training to all staff.

Interview responses suggest that special education teacher, related service provider, paraprofessional and general education teachers are adequately prepared to provide services and support to students receiving special education. Staff reported they do not currently have any students using assistive technology (AT) and do not receive training on AT resources. Building administration indicated that training would be provided to staff if this became necessary. General education teachers commented that district training could be more detailed and teacher support improved.

Building administrators reported staff does not use restrictive procedures. The special education providers and paraprofessional agreed and noted they have received necessary training on restrictive procedures. District personnel confirmed the confidentiality of any personally identifiable data, information and records of students are also maintained.

Minnesota Statute requires that for all paraprofessionals employed to work in special education programs, the district shall ensure each paraprofessional has sufficient knowledge and skills in emergency procedures, building orientation, roles and responsibilities, confidentiality, vulnerability of students and mandatory reporting of suspected abuse before or beginning at the time of employment. Building administrators reported paraprofessionals receive sufficient information from the district in order to meet students' needs. Annual training opportunities also are made available to paraprofessionals to further develop the knowledge and skills that are specific to the students with whom they work, including understanding disabilities, following lesson plans and implementing follow-up instructional procedures and activities. All paraprofessionals reportedly receive sufficient ongoing direction from a licensed teacher; those providing IEP health-related services for a student receiving special education receive ongoing direction from a school nurse where appropriate and when possible.

**Corrective Action: None**

### *Topic Area: Special Education Advisory Council*

Minnesota Statute, section 125A.24, requires school districts establish a special education advisory council (SEAC) to increase the involvement of parents of children with disabilities in district policy making and decision making. The special education director reported the district has a SEAC with a scheduled meeting in May 2017 but does not have membership of which at least half are parents of a student with a disability.

**Corrective Action:** *The district must submit documentation that a SEAC was established with membership at least of which are parents of a child with a disability.*

### *Topic Area: Service Delivery, Teaching Models and Collaboration*

School-aged children with disabilities at Nasha Schkola receive special education services via pull-out services in federal instructional settings 1, which describe the location and the amount of time that a student with an IEP receives special education services.

Special education, building administration and special education staff did not describe any specific limitations to the variety of teaching models or types of service delivery options available to students receiving special education or related services. Special education providers reported receipt of indirect services, including consultation from appropriately licensed providers, if they are not licensed in a student's category of disability and responsible for implementing an IEP.

**Corrective Action: None**

### *Topic Area: Resources and Supports for Staff*

Building administrators receive adequate assistance and support from special education administrators regarding questions and concerns related to special education. Correspondingly, special education providers and general education teachers also receive adequate assistance and support with questions and concerns related to special education from building administration and special education administration.

**Corrective Action: None**

## **Area 2: Facilities, Equipment and Materials**

### *Topic Area: Facilities*

On March 15, an MDE monitor conducted an onsite review of the special education programs and facilities at Nasha Shkola. The purpose of the review is to verify that the classrooms and other facilities in which students receive instruction, related services and supplementary aids and services are accessible, are essentially equivalent to the regular education program, provide an atmosphere that is generally conducive to learning and usually meet the students' special physical, sensory and emotional needs.

The district has one conference room where services are provided. Students receiving speech services utilize an online program with computers located in the conference room. The facility does not have any independently-accessible doors, although there is level pavement at the front entrance. Currently no students with physical impairments attend the school.

Results of the onsite review and interviews completed by building administration, special education service providers, paraprofessionals and general education teachers conclude that classrooms and other facilities in which students receive instruction, related services and supplementary aids and services overall meet the requirements outlined in Minnesota Rule 3525.1400.

Special education and building administration described sufficient procedures, including timelines and individuals involved, when determining classroom needs or locations of classrooms for special education and related services. According to the special education director, the executive director, special education director and lead teacher meet to discuss facility space. The district serves a small special education population, so conversations center on student needs and decisions are made on an individual basis. These discussions are ongoing throughout the year and finalized in March to plan for the following school year. Currently, space for both general and special education students is a challenge. Mainstream class sizes vary by grade level with some classrooms that house large numbers of students in a relatively small space. The district is cautioned that as the special education program grows, space considerations will need to be discussed to ensure the facility provides an atmosphere that is generally conducive to learning and meets the students' special physical, sensory and emotional needs. The special education director agreed that discussions need to occur as the district prepares for next school year and hopes to allot a larger classroom for special education services.

**Corrective Action: None**

#### *Topic Area: Equipment and Supplies*

Minnesota Rule requires districts supply special equipment and instructional materials necessary to provide instruction, related services and supplementary aids and services. Special education service providers, paraprofessionals and general education teachers confirmed they are adequately equipped with special equipment and instructional materials to provide instruction and supports to students receiving special education services.

Staff sufficiently described in interviews steps and procedures special education providers follow in order to obtain special equipment, instructional materials, consumables, etc. necessary to implement IEPs in both general and special education settings. The special education director reported that staff submit requests for materials, equipment and supplies to the lead teacher who discusses applicability and need with the special education director. Informal conversations regarding materials occur on an ongoing basis throughout the school year.

**Corrective Action: None**

#### *Topic Area: Room Used for Seclusion*

The district does not have a room used for seclusion registered on the Minnesota Department of Education's website. No such room was reported in interviews or observed by the MDE monitor during the onsite review.



### **Area 3: Child Find and Evaluation**

#### *Topic Area: Child Find Process*

“Child find” under the Individuals with Disabilities Education Act refers to the local education agency’s obligation to locate, identify and evaluate all children with disabilities. During the special education self-review two years ago, the district’s previous special education director voiced concerns regarding the referral process. The current special education director and building administration reported challenges with families’ reluctance to agree to special education identification or services despite multiple efforts to explain special education to parents and meet with parents regarding the benefits of special education services. The district is commended on these efforts and encouraged to continue exploring opportunities to educate families on special education. Opportunities would include providing additional parent meetings throughout the school year or hiring a community liaison to support families as they move through the child find process.

Several students have been struggling for many years and have been brought to the child find team. As the parents do not provide consent for special education evaluation or IEP programming, the students remain on a “watch list” to monitor progress. Teachers are highly concerned about providing supports to struggling students that do not have parental consent to receive special education services, so the district has implemented tiered interventions for all students to assist in meeting student needs. Individual reading and math supports are provided, along with recently added 30 minutes of guided reading daily for grades 1-8. Staff reported this model was introduced in February and they already are seeing student success.

Minnesota Rule requires that before a school-aged student is referred for a special education evaluation, the district must conduct and document at least two instructional strategies, alternatives or interventions (i.e., “pre-referral interventions”) while the student is in the regular classroom. The special education teacher at Nasha Shkola confirmed students are receiving and teachers are documenting at least two pre-referral interventions in the regular classroom. During initial and follow-up interviews over half of general education teachers reported they do not take part in the referral process or have not referred any students recently; those that have referred recently confirmed pre-referral interventions. General education teachers at Nasha Shkola described participation in a variety of pre-referral process activities: 80% participate in regularly scheduled meetings to discuss student concerns, while 60% indicated the pre-referral process is informal and they instead consult with staff as needed regarding concerns and interventions. Some general education teachers reported they review data to determine if interventions are successful and one noted receiving consultation and supports regarding interventions. The varied responses are likely the result of multiple staff reporting they have not recently referred students as well as changes in the referral process from school year to school year, thus resulting in staff being unsure of the district process. The lead teacher reported that teachers often bring their concerns directly to administration or to the special education teacher to discuss.

According to initial interviews with building administration, Nasha Shkola has a designated child find team that meets twice per month to discuss students participating in the child find process. Administration reported that teachers refer students to child find and the team assigns interventions, speaks with families, arranges observations and proposes the evaluation. The child find/child study team typically includes the general education administrator, general education teacher, special education administrator and special education teacher. In some occasions, the school psychologist

and paraprofessional also may attend the meeting. The child find team also determines if additional interventions are warranted or if the student is in need of a special education evaluation. The same members are involved in initial child find as well as subsequent child study duties. However, during follow-up interviews with administration and school staff, the process was clarified. In the past, child find meet twice a month in the morning when the special education teacher was onsite. This school year the contracted special education teacher provides services in the afternoon and does not attend child find meetings. Staff noted that child find meetings are not held as regularly as previous years, but the team does meet. As noted above, throughout follow-up interviews staff reported a variety of responses regarding when child find meets, the process for referral and if or when training was provided to general education teachers. Administration also provided contradictory information regarding when referral training was provided to general education teachers.

With the understanding that identifying students potentially in need of special education assistance takes time, most general education teachers still agreed that pre-referral interventions do not result in an unreasonable delay of initial evaluation for special education services. However, some responders commented that the process takes several months and students do not receive supports during the process. Most general education teachers also reported being unsure if there is a policy or practice of delaying initial special education evaluations of English language learner students based on his or her English language learner status and limitations on when referrals for students are accepted. Some comments indicated that English language learner evaluations are delayed based on language acquisition.

In addition, child count for the district indicates that 0% of students are identified for special education, although currently there are three students receiving services, compared to the state average of 15.5%. While it is clear that the district is challenged by families' and the school community's reluctance to identify a child as a child with a disability, it is logical to presume that the inability to regularly meet to discuss students, try interventions, and proceed through the referral process are contributing factors in the much smaller numbers of special education students identified by the district. The reluctance of families to agree to special education evaluations also may have created a situation in which district staff presupposes other parents' refusal.

It otherwise is evident from interview responses that there is a breakdown in communication regarding the referral process. After having previously identified concerns, the district has worked on creating a referral system and is commended on these efforts in meeting compliance. However, as determined in this report, stakeholders are confused regarding current district child find policies. The district must ensure information is provided to special education teachers, related service providers and general education teachers to ensure there are no delays for referrals or identification.

The district also utilizes school-wide positive approaches to behavioral interventions so all students acquire appropriate behaviors and skills, including Responsive Classroom and Life Space Crisis Intervention.

**Corrective Action:** *The district must develop and implement a CAP to ensure compliance with pre-referral and identification standards, including processes to limit delays for referrals, rejection of dual services for ELL, or delay for special education identification as required by Minn. Stat. § 125A. 56 and 34 C.F.R. § 300.111.*

### *Topic Area: Transfer Process*

Interview responses from special education providers suggest that Nasha Shkola has sufficient processes in place to ensure the provision of comparable services to special education students who transfer to the district from another district (in-state or out-of-state), as required by federal regulation. Interview responses offered no concerns regarding the prompt transmittal and request of records as well as immediate provision of services upon enrollment.

**Corrective Action: None**

### *Topic Area: Evaluations*

Federal regulation requires that assessments and other evaluation materials used to assess a student are provided and administered in the student's native language or other mode of communication and in the form most likely to yield accurate information on what the student knows and can do academically, developmentally and functionally, unless it is clearly not feasible to so provide or administer; are used for the purposes for which the assessments or measures are valid and reliable; are administered by trained and knowledgeable personnel; and are administered in accordance with any instructions provided by the producer of the assessments.

Federal regulation also requires districts to ensure assessments and other evaluation materials used to assess a student are not discriminatory on a racial or cultural basis. Interview responses affirm that special education providers know when and how to address concerns related to racial or cultural discrimination when evaluating students.

**Corrective Action: None**

### *Topic Area: Exit Procedures*

Federal regulation requires districts to evaluate a child with a disability before determining that the child is no longer a child with a disability. Special education providers indicated they have not recently exited students from special education services when the student has made adequate progress such that continuing need for services no longer exists.

An evaluation is not required before the termination of a child's eligibility due to graduation from secondary school with a regular diploma, or due to exceeding the age eligibility for a free and appropriate public education (FAPE) under state law. For a student whose eligibility terminates under these circumstances, the district must provide him or her with a summary of the student's academic achievement and functional performance, including recommendations on how to assist the student in meeting his or her postsecondary goals. Nasha Shkola Charter School services grades K-8 and therefore is not required to complete summaries of performance for any students.

**Corrective Action: None**

### *Topic Area: Due Process Compliance*

This is the district's first time through MDE Review. In 2016, Nasha Shkola was notified of four findings of noncompliance in three student records associated with Evaluation and Eligibility Standards following its Self-Review. Areas included Evaluation Report, SLD Written Report and Eligibility. The district completed corrective action related to Evaluation Report including components of the SLD written report and eligibility.

This school year, the district was required to review two Part B special education records and report the compliance results to MDE for Timeline, Evaluation and Eligibility Standards related to the evaluation process and identification of special education needs and related services. The district did not have any findings of noncompliance and has demonstrated commendable improvement with due process compliance in the areas of Timeline, Evaluation and Eligibility Standards.

**Corrective Action: None**

## **Area 4: IEP and IFSP Process and Implementation**

### *Topic Area: Least Restrictive Environment*

Interview responses suggested that each school-aged child with a disability is educated with non-disabled peers to the maximum extent possible, has equal access to extra-curricular and nonacademic activities (e.g. counseling services, athletics, transportation, health services, district-sponsored clubs, recess, meals, etc.) available to non-disabled peers and is fully integrated with non-disabled peers to the maximum extent appropriate. If a student is removed from the general education environment, the removal occurs only if the nature or severity of the child's disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily.

**Corrective Action: None**

### *Topic Area: Communicating IEP Content*

Special education providers reported that general education teachers, paraprofessionals and special education teachers reportedly have access to the IEP of each school-aged student with a disability for whom they are responsible via relevant portions of the IEP and through discussion of IEP content with service providers at the beginning of the school year and when appropriate. The speech provider requested having access to the special education online program in order to access IEPs. Paraprofessionals and general education teachers indicated they are sufficiently informed of their specific responsibilities and the specific accommodations, modifications and supports required by the IEPs of the students with whom they work.

**Corrective Action: None**

### *Topic Area: Team Members and Meetings*

Each IEP team must include a representative of the public agency (i.e., “district representative”). The district representative must be qualified to provide, or supervise the provision of, specially designed instruction to meet the unique needs of children with disabilities; knowledgeable about the general education curriculum; and knowledgeable about the availability of resources of the public agency. Building administration and special education providers confirmed that the district representatives at IEP meetings held at Nasha Shkola meet these qualifications.

The majority of general education teachers reported they are not involved in IEP meetings. Of the few that do participate in IEP meetings, they indicated receiving timely notice of IEP meetings and fully participating in the determination of IEP services such as supplemental aids and services, behavioral supports and program modifications.

**Corrective Action: None**

### *Topic Area: Extended School Year*

Federal and state regulations require school districts provide extended school year (ESY) services as necessary to ensure FAPE as determined by a student’s IEP team on an individual basis. Based on interview responses from building administration and special education providers, ESY services are made available as appropriate. Additionally, the district does not limit ESY services to particular categories of disability or unilaterally limit the type, amount, or duration of those services.

**Corrective Action: None**

### *Topic Area: Progress Reporting*

Each district also must ensure an IEP team reviews a school-aged child’s IEP periodically, but not less than annually, to determine whether the student is achieving annual goals; and revise the IEP, as appropriate, to address any lack of expected progress, the results of any reevaluation or information about the student, or the student’s anticipated needs. The district’s special education providers described existing practices that satisfy progress reporting requirements.

**Corrective Action: None**

### *Topic Area: Secondary Transition*

Transition services are coordinated activities for a student with a disability that are focused on improving the academic and functional achievement of the student to assist the student’s shift from school to post-school activities, including postsecondary education, vocational education, integrated employment (including supported employment), continuing and adult education, adult services, independent living, or community participation. Transition services are based on the individual student’s needs, taking into account the student’s strengths, preferences and interests.

Nasha Shkola is a K-8 charter school. Secondary transition is not applicable.

**Corrective Action: None**

*Topic Area: Due Process Compliance*

This is the district's first time through MDE Review. In 2016, Nasha Shkola was notified of 16 findings of noncompliance in three student records associated with Timeline and IEP Standards following its Self-Review. Areas included Team Members, Excusal of Team Members, Present Levels, Short and Long Term Goals and Objectives, Least Restrictive Environment, Special Education and Related Services, When IEP Must Be in Effect, Review and Revision of IEP (ESY), Progress Reporting, Modification of Assessment and Review and Revision of IEP. The district completed corrective action related Development of IEP, Team Members and Progress Reporting to address the above noncompliance issues.

This school year, the district was required to review two Part B special education records and report the compliance results to MDE for Timeline and IEP/IFSP Standards related to the IEP process and provision of special education and related services. The results reported by the district indicate no findings of noncompliance. Nasha Shkola Charter Schools has demonstrated improvement with due process compliance.

**Corrective Action: None**

## Summary of Corrective Action Required

Formal findings of individual student record noncompliance were issued from 0 of the 2 files reviewed. Nasha Shkola Charter School (4208-07) received notification of no findings of individual student noncompliance on April 1, 2018.

Noncompliance identified in this report must be corrected within one year of the date of this report. Following is a summary of the noncompliance areas requiring a corrective action plan (CAP):

Area	Focus Area	Regulatory Reference
1	Address establishing SEAC membership and maintain record of scheduled meetings and attendance	Minn. Stat. § 125A.24
2	No findings at the time of the report	
3	Identification of Pupils with Disabilities Address Pre-referral and Child Find Process	Minn. R. 3525.0750
4	No findings at the time of the report	

The district must enter a proposed CAP into the MNCIMP:SR system for each finding within 45 calendar days from the date of this monitoring report. Please review the CAP Development Guide enclosed with this report. For clarification of the issues in this report or assistance needed prior to developing the CAPs, please contact the district's lead monitor indicated below.

For questions regarding the content of this report, please contact the district's lead monitor:

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## Appendix

The appendix includes special education child count data related to disability and federal instructional setting, race/ethnicity and age, as well as data on individual student record noncompliance, complaint decisions and interview and survey reliability.

### Acronyms

#### Data sources

CC	Child count
Srv	Students served by the district
RR	Students sampled for the record review

#### Disability categories

ASD	Autism Spectrum Disorders
DB	Deaf-Blind
DCD-MM	Developmental Cognitive Disability: Mild to Moderate
DCD-SP	Developmental Cognitive Disability: Severe to Profound
DD	Development Delay
DHH	Deaf and Hard of Hearing
EBD	Emotional or Behavioral Disorders
OHD	Other Health Disabilities
PI	Physically Impaired
SLD	Specific Learning Disability
SLI	Speech or Language Impairments
SMI	Severely Multiply Impaired
TBI	Traumatic Brain Injury
VI	Visually Impaired

#### Child Count

In the December 1, 2017, Part B federal child count, students identified as receiving special education and related services are 0.0 percent (n = 0) of the district total enrollment compared to the statewide average of 15.5 percent.



### **Individual Student Record Noncompliance**

Individual citations of noncompliance are identified by student and reported through the web-based MNCIMP:SR tracking system. The district had no findings of individual noncompliance as formally notified on April 1, 2018.

### **Complaint Decisions**

Complaint files were reviewed for records of formal complaints filed regarding Nasha Shkola Charter School (4208-07) and no formal complaints were opened during the relevant time period.

### **Interviews**

Online interviews were completed by building administrators, special education staff, general education teachers and special education paraprofessionals, with follow-up telephone and on-site interviews completed as deemed necessary.